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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10
11 FEDERAL TRADE COMMISSION,

12 Plaintiff,

13 v.

14 OMICS GROUP INC., et al.,

15 Defendants.
16

Case No. 2:16-cv-02022-GMN-VCF

STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINE

17 Defendants, OMICS GROUP INC., IMEDPUB LLC, CONFERENCE SERIES LLC,
18 and SRINUBABU GEDELA, by and through counsel of record, D. Neal Tomlinson and
19 Kristina R. Kleist, and Plaintiff, FEDERAL TRADE COMMISSION, by and through counsel of
20 record, Gregory A. Ashe and Michael E. Tankersley, hereby agree and stipulate as follows:

- 21 1. Plaintiff filed a Motion for Sanctions and Motion to Compel on May 9, 2018 (Dkt.
22 Nos. 92, 94), responses due on May 23, 2018.
- 23 2. This Court granted stipulations for extensions of time (Dkt. Nos. 98 and 100)
24 extending the due date for the response to June 8, 2018.
- 25 3. Defense counsel has been dealing with multiple family medical issues that have
26 required counsel to be out of the office, and additional time is needed to confer with
27 Defendants and respond to Plaintiff's Motions.
28

1 4. In addition, additional time is necessary due to the fact that all Defendants are
2 located in India, and that language, time zones and geographical barriers have
3 presented significant challenges in that defense counsel has encountered difficulty
4 explaining and communicating with the Defendants regarding the many issues and
5 complexities of the pending motions.

6 5. Plaintiff's counsel has agreed to extend the response date to June 22, 2018.

7 6. This Stipulation is being made in good faith between and at the request of both
8 parties, and not for purposes of delay.

9 HYPERION ADVISORS

FEDERAL TRADE COMMISSION

10 Dated this 7th day of June, 2018.

Dated this 7th day of June, 2018.

11 /s/ D. Neal Tomlinson

/s/ Gregory A. Ashe

12 D. NEAL TOMLINSON

ALDEN F. ABBOTT

13 Nevada Bar No. 06851

General Counsel

14 KRISTINA R. KLEIST

GREGORY A. ASHE

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MICHAEL E. TANKERSLEY

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Washington, DC 20850

Attorneys for Defendants

Attorneys for Plaintiff

17 **ORDER**

18 Pursuant to the stipulation of the parties, the deadline for Defendants to file their
19 responses to the Motion for Sanctions and Motion to Compel is hereby extended to June 22,
20 2018.

21 **IT IS SO ORDERED.**

22 Dated this 11th day of June
23 _____, 2018.

24
25 Respectfully submitted by:

26 HYPERION ADVISORS
27
28



United States Magistrate Judge

/s/ *D. Neal Tomlinson*

D. NEAL TOMLINSON
Nevada Bar No. 06851
KRISTINA KLEIST
Nevada Bar No. 13520
Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 7, 2018, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE** was filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ D. Neal Tomlinson
Attorney for Defendants